

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.	Adv. Pro. No. 08-01789 (CGM) SIPA Liquidation (Substantively Consolidated)
In re: BERNARD L. MADOFF, Debtor.	Adv. Pro. No. 11-02572 (CGM)

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC, and Bernard L. Madoff,

Plaintiff,
v.

KOREA EXCHANGE BANK, individually
and as Trustee for Korea Global All Asset
Trust I-1, and as Trustee for Tams Rainbow
Trust III,

Defendant.

STIPULATION AND ORDER

Plaintiff Irving H. Picard (the “Trustee”), trustee for the substantively consolidated liquidation proceeding of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III (“SIPA”), and the chapter 7 estate of Bernard L. Madoff, and defendant Korea Exchange Bank (“Defendant”), by and through their respective and undersigned counsel, state as follows:

IT IS HEREBY STIPULATED AND AGREED, that, the deadline for the Defendant to respond to the First Amended Complaint in the Action (ECF No. 30, filed on June 6, 2012) shall be May 16, 2022. If Defendant files a motion to dismiss, such motion shall set forth any and all grounds for dismissal required to be asserted at the pleading stage. The deadline for the Trustee to respond to the motion shall be July 15, 2022, and the deadline for the Defendant to file a reply shall be August 15, 2022.

IT IS FURTHER STIPULATED AND AGREED, that if Defendant files a motion to dismiss, then the parties shall request oral argument on the motion at the Court's first available convenience.

Dated: January 26, 2022
New York, New York

By: /s/ David J. Sheehan
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Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate
of Bernard L. Madoff*

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*Attorney for Defendant Korea Exchange
Bank*

Dated: January 27, 2022
Poughkeepsie, New York



/s/ **Cecelia G. Morris**

Hon. Cecelia G. Morris
Chief U.S. Bankruptcy Judge